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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 Teresa Calma,

13 Plaintiff,

14 v.

15 Equifax Information Services, LLC;  
16 Experian Information Solutions, Inc.;  
17 and Pennymac Loan Services, LLC,

18 Defendants.

Case No.: 2:22-cv-02105-ART-EJY

**Motion for an extension of time for  
Defendant Experian Information  
Solutions, Inc. to respond to  
Plaintiff's complaint**

**First Request**

21 Teresa Calma ("Plaintiff"), by and through counsel, hereby requests an  
22 extension of time for Defendant Experian Information Solutions, Inc.  
23 ("Defendant") to respond to Plaintiff's complaint. Defendant's responsive  
24 pleading was due on January 11, 2022.

25 The extension is sought because the parties are engaged in active  
26 settlement discussions and informal discovery to assist the case resolution  
27 efforts. Plaintiff does not oppose an extension of Defendant's time to answer  
the complaint so that the parties may devote their energies to resolving this

1 matter.

2 This is the first request for an extension of this deadline and the request  
3 is made after the deadline has expired due to excusable neglect. Through  
4 counsel, Defendant requested that Plaintiff stipulate to an extension on January  
5 10, 2022 and Plaintiff agreed through counsel on January 11, 2022, but  
6 the parties failed to submit a request to the Court.

7 In good faith and not for the purposes of delay, Plaintiff submits  
8 this motion, on behalf of Defendant, and requests that this Court extend  
9 Defendant's deadline to file its responsive pleading until on or before  
10 **February 8, 2023.**

11  
12 Dated: January 24, 2023.

13  
14 **FREEDOM LAW FIRM, LLC**

15 /s/ Gerardo Avalos  
16 George Haines, Esq.  
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21  
22 IT IS SO ORDERED:

23  
24   
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: January 24, 2023  
27